Comments on Petition for Waiver - 3650-3700 MHz

Verso Networks is a local, independent Wireless ISP serving the Denver metro area by providing competitive broadband Internet service to single-family residential, multi-family residential, and small business customers. We deliver speeds from 25 Mbps up to 500 Mbps to approximately 2,000 customers and we are growing steadily. We are developing a very loyal and supportive customer base that prefers a local ISP instead of the big carriers because we deliver better value and a superior customer experience.

Verso Networks supports the Petition for Waiver filed by WISPA to extend the transition deadline to January 8, 2023 for 3650-3700 MHz equipment to be certified under Part 96. We have deployed a significant amount of 3560-3700 MHz equipment in anticipation of CBRS, and would like more time to execute the transition since the window was shortened due to the delays in the CBRS rules and subsequent delays in ESC and SAS certifications. We are concerned that commercial deployment will continue to be delayed and that the supply chain will not sufficiently develop in time to execute the transition smoothly. Commercial deployment looks to happen well into 2019 which will probably leave under a year to the current deadline of April 2020. We are a small company with limited resources and budget so we would like to spread the costs out over a few years.

Extending the deadline to January 8, 2023 will ensure a smoother transition that will reduce service disruptions to consumers.

Sincerely, William Fowler President Verso Networks